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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,	)	CR 05-60008-01
	)	
Plaintiff,	)	GOVERNMENT'S MOTION
	)	TO AMEND RELEASE
vs.	)	CONDITIONS
	)	
PEROUZ SEDAGHATY,	)	
a/k/a Pete Seda and Abu Yunus,	)	
	)	
Defendant.	)	

The United States of America, through its undersigned counsel,  
herein requests that defendant Sedaghaty's conditions of pretrial release  
be amended.

It is requested that defendant Sedaghaty be ordered to have no  
direct or indirect contact with the following individuals, who may be called

as witnesses by the government at trial:

Barbara Cabral  
Thomas Wilcox  
Ferhad Erdogan  
Daveed Gartenstein-Ross  
Helen Moore  
Debra Ingram

Steven Wax, counsel for defendant, has been consulted about this motion. His position is:

While, given the nature of the relationships with the listed witnesses, Mr. Seda does not believe that a no contact provision is necessary, he does not object to inclusion of the provision at this time. He reserves the right, however, to seek permission to participate in interviews with the witnesses with his attorneys or their investigators if that becomes necessary in the future.

Based on the above, the government asks this Court to grant the motion and amend defendant's pretrial release conditions.

DATED this 4<sup>th</sup> day of April, 2008.

KARIN J. IMMERGUT  
United States Attorney  
District of Oregon

/s/ Christopher L. Cardani  
CHRISTOPHER L. CARDANI  
Assistant United States Attorney